

EXHIBIT "A"

STATE OF ALABAMA )

JEFFERSON COUNTY )

Brian D. Hancock, being duly sworn, deposes and says:

1. That he is the attorney of record for the plaintiff, and has personal knowledge of the facts set forth in this affidavit.
2. That the defendant was duly served with a copy of the summons, together with a copy of the plaintiff's complaint on the 7th day of July 2005.
3. That more than twenty (20) days have elapsed since the date on which the said defendant was served with summons and a copy of the complaint.
4. That the defendant has failed to answer or otherwise defend as to plaintiff's complaint, or serve a copy of any answer or other defense which he might have upon the undersigned attorney of record for the plaintiff.
5. That this affidavit is executed by affiant herein in accordance with Rule 55(a) of the Federal Rules of Civil Procedure, for the purpose of enabling the plaintiff to obtain an entry of default against the defendant, for his failure to answer or otherwise defend as to plaintiff's complaint.

  
Brian D. Hancock

Sworn to and subscribed before me on this the  
20 day of December, 2005.



My Commission Expires: NOTARY PUBLIC STATE OF ALABAMA AT LARGE  
MY COMMISSION EXPIRES: May 20, 2007  
BONDED THRU NOTARY PUBLIC UNDERWRITERS